

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

IN RE:

ATHEAL PIERCE,

Debtor.

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)

**CHAPTER 13
CASE NO. 05-31205**

MOTION TO SET HEARING

Comes Now American General Finance, by and through its attorney of record, Parnell & Crum, and states that it filed a Motion to Modify Stay with this Honorable Court on June 15, 2005. Pursuant to LBR 4001-1, the Movant indicated it was willing to consider an adequate protection agreement. However, the parties have not been able to reach an agreement as of yet. As a result, the Movant is requesting that the matter be set for hearing.

WHEREFORE, THE PREMISES CONSIDERED, American General Finance would respectfully request that its Motion to Modify Stay be set for hearing at an appropriate date and time specified by this Honorable Court.

Respectfully submitted,

PARNELL & CRUM, P.A.

/s/ Britt B. Griggs

By: BRITT BATSON GRIGGS

Attorney for American General Finance

OF COUNSEL:

PARNELL & CRUM, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically mailed or placed in the U.S. mail, postage prepaid, an exact copy of the above to the following Motion to Set Hearing, this the 14th day of July, 2005.

Hon. Curtis C. Reding
Trustee
Post Office Box 173
Montgomery, Alabama 36101-0173

Atheal Pierce
Debtor
112 Knollwood Blvd.
Montgomery, Alabama 36117

Hon. Teresa Jacobs
Bankruptcy Court Adm.
1 Church Street, 5th Floor
Montgomery, Alabama 36104

/s/ Britt B. Griggs
BRITT BATSON GRIGGS